

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

DEC 14 2016

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

No:

v.

4:16CR541 CEJ/SPM

JUSTIN WOODSON, a/k/a "Jetty," "Juddy",

TYRONE L. WILLIAMS, a/k/a "Fatman",

TYRONE ROBINSON, a/k/a "Ty",

TERRY T. WILLIAMS, a/k/a "Sleepy",

HAROLD WILLIAMS, a/k/a "HB",

ASHLEY SHAW,

ERIC L. DILWORTH, a/k/a "Ebay",

COREY L. COBB,

CHRISTOPHER J. HARRIS,

SIERRA PARRISH, a/k/a "CC",

LOUETTA M. DORSEY,

BRIAN JONES, and

DONTE M. CLAUSELL,

Defendants.

INDICTMENT

COUNT ONE

The Grand Jury charges that:

A. Beginning at an exact time unknown to the Grand Jury but including April 2004 and continuing to the date of this Indictment, in the Eastern District of Missouri and elsewhere, the defendants,

JUSTIN WOODSON, a/k/a "Jetty," "Juddy",

TYRONE L. WILLIAMS, a/k/a "Fatman",

TYRONE ROBINSON, a/k/a "Ty",

TERRY T. WILLIAMS, a/k/a "Sleepy",

**HAROLD WILLIAMS, a/k/a "HB",
ASHLEY SHAW,
ERIC L. DILWORTH, a/k/a "Ebay",
COREY L. COBB,
CHRISTOPHER J. HARRIS,
SIERRA PARRISH, a/k/a "CC",
LOUETTA M. DORSEY, and
DONTÉ M. CLAUSELL,**

did knowingly and unlawfully combine, conspire, confederate, and agree, together with each other and other persons both known and unknown to the Grand Jury, to distribute and to possess with the intent to distribute a mixture or substance containing the following controlled substances, to wit: 1) heroin, a Schedule I controlled substance; 2) cocaine, a Schedule II controlled substance, and 3) cocaine base (also known as "crack cocaine"), a Schedule II controlled substance; all in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

B. MANNER AND MEANS OF THE CONSPIRACY

The defendants accomplished and attempted to accomplish the objects of the conspiracy in the following manner and through the following means:

1. It was part of the drug-trafficking conspiracy that **TYRONE L. WILLIAMS (a/k/a "Fatman")** and **JUSTIN WOODSON (a/k/a "Jetty", "Juddy")** would obtain quantities of cocaine from a source in Austin, Texas, who would transport it to St. Louis, Missouri.
2. It was further part of the drug-trafficking conspiracy that **TYRONE ROBINSON, a/k/a "Ty"**, served as one of the sources of supply for cocaine to the conspiracy.
3. It was further part of the drug-trafficking conspiracy that in October 2013, defendant **JUSTIN WOODSON** was supplied approximately 500 grams of a mixture or substance

containing a detectable amount of cocaine by defendant **TYRONE ROBINSON**, which was transported to St. Louis, Missouri from Austin, Texas.

4. It was further part of the drug-trafficking conspiracy that **JUSTIN WOODSON** (a/k/a "**Jetty**", "**Juddy**") would hire couriers, often times females, to drive controlled substances from St. Louis, Missouri to Hannibal, Missouri, and **JUSTIN WOODSON** would follow the couriers in a separate car to monitor the transportation of the narcotics. The couriers included defendants **ASHLEY SHAW**, **SIERRA PARRISH** (a/k/a "**CC**"), and others.

5. It was further part of the drug-trafficking conspiracy that, after being transported to Hannibal, Missouri, a large portion of the cocaine would then be converted into cocaine base, also known as crack cocaine, for distribution.

6. It was further part of the drug-trafficking conspiracy that defendants **TYRONE L. WILLIAMS** (a/k/a "**Fatman**"), and **JUSTIN WOODSON** (a/k/a "**Jetty**", "**Juddy**"), ran a well-known, open-air drug market in the area of the 2000 block of Gordon Street in Hannibal, Missouri for several years.

7. It was further part of the drug-trafficking conspiracy that **TYRONE L. WILLIAMS** (a/k/a "**Fatman**"), and his drug-trafficking organization would normally utilize one primary crack cocaine distributor, who worked directly under the supervision of **TYRONE L. WILLIAMS** (a/k/a "**Fatman**").

8. It was further part of the drug-trafficking conspiracy that the primary distributor for the **TYRONE L. WILLIAMS** drug-trafficking organization would use one telephone number that would be given to customers who wanted to order narcotics. The phone associated with that telephone number would be passed from distributor to distributor, so that one common number

was given to customers, but multiple people could be responsible for relaying orders to **TYRONE L. WILLIAMS (a/k/a "Fatman")**.

9. It was further part of the drug-trafficking conspiracy that this primary distributor for the **TYRONE L. WILLIAMS** drug-trafficking organization changed frequently due to narcotics-related arrests. During the course of the conspiracy, primary distributors for **TYRONE L. WILLIAMS (a/k/a "Fatman")** included, but were not limited to, defendants **ERIC L. DILWORTH (a/k/a "Ebay")**, **HAROLD WILLIAMS (a/k/a "HB")**, **COREY COBB, JR.**, and **TERRY WILLIAMS (a/k/a "Sleepy")**.

10. It was further part of the drug-trafficking conspiracy that members of the conspiracy arranged for and did in fact distribute heroin, cocaine, and cocaine base in the Hannibal, Missouri area and elsewhere in the Eastern District of Missouri. Distributors included, but were not limited to, defendants **COREY L. COBB**, **CHRISTOPHER J. HARRIS**, **LOUETTA M. DORSEY**, and **DONTE M. CLAUSELL**.

11. It was further part of the drug-trafficking conspiracy that **TERRY L. WILLIAMS, a/k/a "Sleepy"**, aided and abetted in maintaining a location at which controlled substances were stored (commonly referred to as a "stash house"), and served as a distributor for the conspiracy.

12. It was further part of the drug-trafficking conspiracy that the organization utilized telephones, including cellular telephones, to communicate with other members of the organization to facilitate their drug trafficking and often utilized code words in order to conceal their drug-trafficking activity.

13. It was further part of the drug-trafficking conspiracy that the distribution of heroin, cocaine, and cocaine base generated significant proceeds.

14. It was further part of the drug-trafficking conspiracy that the organization accumulated large quantities of United States currency, as well as assets often concealed in the names of others, from the distribution and sale of heroin, cocaine, and cocaine base.

All in violation of Title 21, United States Code, Section 846; and

The quantity of cocaine involved in the offense was in excess of 5 kilograms, making the offense punishable under Title 21, United States Code, Section 841(b)(1)(A)(ii)(II).

The quantity of cocaine base, also known as “crack cocaine”, involved in the offense was in excess of 280 grams, making the offense punishable under Title 21, United States Code, Section 841(b)(1)(A)(iii).

COUNT TWO

The Grand Jury further charges that:

On or about August 2, 2012, in Marion County and elsewhere within the Eastern District of Missouri, the defendant,

ERIC L. DILWORTH, a/k/a “Ebay”,

did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT THREE

The Grand Jury further charges that:

On or about September 8, 2012, in Marion County and elsewhere within the Eastern District of Missouri, the defendant,

TYRONE L. WILLIAMS, a/k/a “Fatman”,

did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FOUR

The Grand Jury further charges that:

On or about October 24, 2012, in Marion County and elsewhere within the Eastern District of Missouri, the defendant,

ERIC L. DILWORTH, a/k/a “Ebay”,

did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FIVE

The Grand Jury further charges that:

On or about December 6, 2012, in Marion County and elsewhere within the Eastern District of Missouri, the defendant,

TYRONE L. WILLIAMS, a/k/a “Fatman”,

did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT SIX

The Grand Jury further charges that:

On or about February 1, 2013, in Lincoln County and elsewhere within the Eastern District of Missouri, the defendant,

ASHLEY SHAW,

did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

COUNT SEVEN

The Grand Jury further charges that:

On or about February 12, 2013, in Lincoln County and elsewhere within the Eastern District of Missouri, the defendant,

TYRONE WILLIAMS, a/k/a "Fatman",

did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

COUNT EIGHT

The Grand Jury further charges that:

On or about March 1, 2013, in Marion County and elsewhere within the Eastern District of Missouri, the defendant,

HAROLD WILLIAMS, a/k/a "HB",

did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT NINE

The Grand Jury further charges that:

On or about May 9, 2013, in Marion County and elsewhere within the Eastern District of Missouri, the defendant,

COREY L. COBB,

did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TEN

The Grand Jury further charges that:

On or about May 22, 2013, in Marion County and elsewhere within the Eastern District of Missouri, the defendant,

TYRONE L. WILLIAMS, a/k/a "Fatman",

did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT ELEVEN

The Grand Jury further charges that:

On or about June 25, 2013, in Marion County and elsewhere within the Eastern District of Missouri, the defendant,

TYRONE L. WILLIAMS, a/k/a "Fatman",

did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWELVE

The Grand Jury further charges that:

On or about July 25, 2013, in Marion County and elsewhere within the Eastern District of Missouri, the defendant,

TYRONE L. WILLIAMS, a/k/a "Fatman",

did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT THIRTEEN

The Grand Jury further charges that:

On or about October 11, 2013, in Lincoln County and elsewhere within the Eastern District of Missouri, the defendants,

**JUSTIN WOODSON, a/k/a "Jetty", "Juddy", and
TYRONE ROBINSON, a/k/a "Ty",**

did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

The quantity of mixture or substance containing a detectable amount of cocaine involved in the offense was in excess of 500 grams, making the offense punishable under Title 21, United States Code, Section 841(b)(1)(B)(ii)(II).

COUNT FOURTEEN

The Grand Jury further charges that:

On or about October 16, 2013, in Marion County and elsewhere within the Eastern District of Missouri, the defendants,

**JUSTIN WOODSON, a/k/a "Jetty", "Juddy", and
CHRISTOPHER J. HARRIS,**

did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FIFTEEN

The Grand Jury further charges that:

On or about January 10, 2014, in Marion County and elsewhere within the Eastern District of Missouri, the defendants,

**JUSTIN WOODSON, a/k/a “Jetty”, “Juddy”, and
CHRISTOPHER J. HARRIS,**

did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT SIXTEEN

The Grand Jury further charges that:

On or about March 13, 2014, in Marion County and elsewhere within the Eastern District of Missouri, the defendant,

TYRONE L. WILLIAMS, a/k/a “Fatman”,

did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT SEVENTEEN

The Grand Jury further charges that:

On or about March 18, 2014, in Lincoln County and elsewhere within the Eastern District of Missouri, the defendant,

SIERRA PARRISH, a/k/a “CC”,

did knowingly and intentionally possess with the intent to distribute cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT EIGHTEEN

The Grand Jury further charges that:

On or about March 27, 2014, in Marion County and elsewhere within the Eastern District of Missouri, the defendant,

TERRY T. WILLIAMS, a/k/a “Sleepy”,

did knowingly and intentionally possess with the intent to distribute the following: 1) a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, and 2) cocaine base, a Schedule II controlled substance, all in violation of Title 21, United States Code, Section 841(a)(1).

COUNT NINETEEN

The Grand Jury further charges that:

On or about October 7, 2014, in Marion County and elsewhere within the Eastern District of Missouri, the defendant,

TYRONE L. WILLIAMS, a/k/a “Fatman”,

did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY

The Grand Jury further charges that:

On or about February 11, 2016, in Marion County and elsewhere within the Eastern District of Missouri, the defendant,

JUSTIN WOODSON, a/k/a “Jetty”, “Juddy”,

did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-ONE

The Grand Jury further charges that:

On or about February 15, 2016, in Marion County and elsewhere within the Eastern District of Missouri, the defendant,

TYRONE L. WILLIAMS, a/k/a “Fatman”,

did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-TWO

The Grand Jury further charges that:

On or about August 2, 2016, in Marion County and elsewhere within the Eastern District of Missouri, the defendants,

**JUSTIN WOODSON, a/k/a “Jetty”, “Juddy”, and
TYRONE L. WILLIAMS, a/k/a “Fatman”,**

did knowingly and intentionally possess with the intent to distribute cocaine base, a Schedule II controlled substance, and marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

The quantity of mixture or substance containing a detectable amount of cocaine base involved in the offense was in excess of 28 grams, making the offense punishable under Title 21, United States Code, Section 841(b)(1)(B)(iii).

COUNT TWENTY-THREE

The Grand Jury further charges that:

Between on or about June 29, 2013, and the date of this Indictment, in Marion County and elsewhere within the Eastern District of Missouri, the defendant

TERRY T. WILLIAMS, a/k/a "Sleepy",

did knowingly and intentionally use a communication facility in committing or in causing or facilitating the commission of the distribution, and possession with the intent to distribute, heroin, cocaine, and cocaine base, in violation of Title 21, United States Code, Section 843(b).

COUNT TWENTY-FOUR

The Grand Jury further charges that:

Between on or about August 23, 2013, and the date of this Indictment, in Marion County and elsewhere within the Eastern District of Missouri, the defendant

SIERRA PARRISH, a/k/a "CC",

did knowingly and intentionally use a communication facility in committing or in causing or facilitating the commission of the distribution, and possession with the intent to distribute, heroin, cocaine, and cocaine base, in violation of Title 21, United States Code, Section 843(b).

COUNT TWENTY-FIVE

The Grand Jury further charges that:

Between on or about December 1, 2013, and the date of this Indictment, in Marion County and elsewhere within the Eastern District of Missouri, the defendant

LOUETTA M. DORSEY,

did knowingly and intentionally use a communication facility in committing or in causing or facilitating the commission of the distribution, and possession with the intent to distribute, heroin, cocaine, and cocaine base, in violation of Title 21, United States Code, Section 843(b).

COUNT TWENTY-SIX

The Grand Jury further charges that:

Between on or about August 17, 2013, and the date of this Indictment, in Marion County and elsewhere within the Eastern District of Missouri, the defendant

DONTE M. CLAUSELL,

did knowingly and intentionally use a communication facility in committing or in causing or facilitating the commission of the distribution, and possession with the intent to distribute, heroin, cocaine, and cocaine base, in violation of Title 21, United States Code, Section 843(b).

COUNT TWENTY-SEVEN

The Grand Jury further charges that:

On or about October 21, 2014, in Marion County and elsewhere within the Eastern District of Missouri, the defendant

TYRONE L. WILLIAMS, a/k/a “Fatman”,

after having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly and unlawfully possess the following ammunition, to wit: a handgun magazine containing .22 caliber ammunition, which had previously been transported in interstate commerce. In violation of Title 18, United States Code, Section 922(g)(1), and punishable under Title 18, United States Code, Section 924(a)(2).

COUNT TWENTY-EIGHT

The Grand Jury further charges that:

Between on or about August 2011, and the date of this Indictment, in Marion County and elsewhere within the Eastern District of Missouri, the defendants

**TYRONE L. WILLIAMS, a/k/a “Fatman”,
ASHLEY SHAW, and
BRIAN JONES,**

did knowingly and intentionally combine, conspire, confederate, and agree, together with each other and other persons both known and unknown to the Grand Jury, to: (a) knowingly conduct and attempt to conduct financial transactions affecting interstate commerce, to wit: the deposits of United States currency into accounts at financial institutions; (b) which in fact involved the proceeds of a specified unlawful activity, to wit: conspiracy to distribute heroin, cocaine, and cocaine base, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), as described in Counts One through Twenty-Two; and (c) with the intent to promote the carrying on of specified unlawful activity, and knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and to avoid a transaction reporting requirement under State or Federal law. While conducting and attempting to conduct said financial transactions, the defendants,

**TYRONE L. WILLIAMS, a/k/a "Fatman",
ASHLEY SHAW, and
BRIAN JONES,**

knew that the funds involved in the financial transactions represented the proceeds of some form of unlawful activity.

In violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 1956(a)(1)(B)(ii); and all in violation of Title 18, United States Code, Section 1956(h).

COUNT TWENTY-NINE

The Grand Jury further charges that:

Between in or about December 2013 and April 2014, in St. Louis County, within the Eastern District of Missouri and elsewhere, the defendants

**JUSTIN WOODSON, a/k/a "Jetty", "Juddy", and
TYRONE ROBINSON, a/k/a "Ty",**

did knowingly and intentionally combine, conspire, confederate, and agree, together with each other and other persons both known and unknown to the Grand Jury, to: (a) knowingly conduct and attempt to conduct a financial transaction affecting interstate commerce, to wit: the transfer of title to a 2007 Dodge Magnum, VIN # 2D4FV47V57H703543; (b) which in fact involved the proceeds of a specified unlawful activity, to wit: conspiracy to distribute heroin, cocaine, and cocaine base, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), as described in Counts One through Twenty-Two; and (c) with the intent to promote the carrying on of specified unlawful activity, and knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity. While conducting and attempting to conduct said financial transactions, the defendants

**JUSTIN WOODSON, a/k/a “Jetty”, “Juddy”, and
TYRONE ROBINSON, a/k/a “Ty”,**

knew that the funds involved in the financial transactions represented the proceeds of some form of unlawful activity.

In violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 1956(a)(1)(B)(i); and all in violation of Title 18, United States Code, Section 1956(h).

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. The allegations of Counts One through Twenty-Six of this Indictment are re-alleged and by this reference, are fully incorporated herein for the purpose of alleging forfeitures to the United States pursuant to the provisions of Title 21, United States Code, Section 853.

2. Pursuant to Title 21, United States Code, Section 853(a), upon conviction of an offense in violation of Title 21, United States Code, Sections 841(a)(1), 843 and 846 as set forth in Counts One through Twenty-Six of this indictment, the defendants,

**JUSTIN WOODSON, a/k/a "Jetty," "Juddy",
TYRONE L. WILLIAMS, a/k/a "Fatman",
TYRONE ROBINSON, a/k/a "Ty",
TERRY T. WILLIAMS, a/k/a "Sleepy",
HAROLD WILLIAMS, a/k/a "HB",
ASHLEY SHAW,
ERIC L. DILWORTH, a/k/a "Ebay",
COREY L. COBB,
CHRISTOPHER J. HARRIS,
SIERRA PARRISH, a/k/a "CC",
LOUETTA M. DORSEY, and
DONTE M. CLAUSELL,**

shall forfeit to the United States of America any property, constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as a result of such violations and any property used, or intended to be used, in any manner or part to commit or to facilitate the commission of such violations.

3. Subject to forfeiture upon a conviction of Counts One through Twenty-Six is a sum of money equal to the total property constituting, or derived from, any proceeds obtained directly or indirectly as a result of such violations.

4. Properties subject to forfeiture as set out in paragraphs 2 and 3 above include, but are not limited to:

(a) The interest of ALL defendants in:

- i. A 2010 Dodge Challenger, VIN # 2B3CJ4DV8AH103138;
- ii. A 2008 Dodge Charger, VIN # 2B3LA43G58H138457;
- iii. 1810 HOPE ST, HANNIBAL, MO 63401-3938 (MARION COUNTY);

iv. 2115 E GORDON ST, HANNIBAL, MO 63401-3816 (MARION COUNTY);

and

v. 1902 SETTLES ST, HANNIBAL, MO 63401-4530 (MARION COUNTY).

5. Pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Section 922(g)(1) as set forth in Count Twenty-Seven, defendant **TYRONE L. WILLIAMS, a/k/a "Fatman"**, shall forfeit to the United States of America any ammunition involved in, used, or intended to be used in said offense, including but not limited to the ammunition described in Count Twenty-Seven.

6. Upon conviction of the offenses set forth in Counts Twenty-Eight and Twenty-Nine of this Indictment, the defendants

**TYRONE L. WILLIAMS, a/k/a "Fatman",
ASHLEY SHAW,
BRIAN JONES,
JUSTIN WOODSON, a/k/a "Jetty", "Juddy", and
TYRONE ROBINSON, a/k/a "Ty",**

shall forfeit to the United States all property involved in the offense and all property traceable to such property, including but not limited to, all property constituting proceeds obtained as a result of those violations, and all property used in any manner or part to commit or to facilitate the commission of those violations. All pursuant to Title 18, United States Code, Section 982(a)(1).

7. Properties subject to forfeiture as set out in paragraph 6 above include, but are not limited to: the interest of all defendants in a 2007 Dodge Magnum, VIN # 2D4FV47V57H703543.

8. If any of the property described above, as a result of any act or omission of the defendants:

a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

FOREPERSON

RICHARD G. CALLAHAN
United States Attorney

AMANDA S. WICK, #501043DC
Assistant United States Attorney